

# Anti-Bribery Policy

## Introduction

PB Design (the “Company”) will not tolerate any form of bribery by, or of, its employees, temporary workers, agents or consultants or any person or body acting on its behalf. The Company and its senior management are committed to implementing effective measures to prevent, monitor and eliminate bribery.

Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual(s) concerned, may cause serious damage to the reputation and standing of the Company and, in certain cases, may lead to the prosecution of the Company and its senior managers. For employees, any such breach is likely to be deemed gross misconduct.

## Purpose and scope

The purpose of this policy is to set out the responsibilities of all Company staff whether permanent, contract or temporary.

## Definitions

“Bribery” means the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical, or a breach of trust. “Bribes” or “inducements” can take many forms, including but not limited to, gifts, loans, fees, rewards, donations, facilitation payments, and services, travel or accommodation either at a reduced rate or without charge.

A “facilitation payment” is a payment or gift (usually to a government official) to expedite or perform a procedure but does not include fees required to be paid by law.

## Unacceptable behaviour

Employees, agents, consultants or any other person or body acting on the Company’s behalf must not, in connection with their relationship with the Company, whether directly or indirectly, accept, request, offer or pay a bribe or inducement.

No employee will suffer demotion, penalty or other adverse consequences for refusing to pay a bribe, even if such refusal results in the Company losing business.

The Company will take appropriate action wherever it sees the opportunity to stop the practice of facilitation payments or bribery, generally.

## Donations to organisations

“Donation” in this context means any gift, subscription, loan, advance or deposit of money, or anything of value or money’s worth.

The Company does not make political donations other than to the extent that it may contribute expertise, resources or the time of employees or consultants retained by the Company, to assist certain groups or organisations concerned with the review of policy, legislation or regulation.

Donations must not be made to any charity or other organisation, directly or indirectly without the prior approval of the relevant work group.

Approval of any donation must be made only in accordance with all applicable laws.

## **Responsibilities**

It is the responsibility of all Company employees and any other person or body working on the Company's behalf, to seek to prevent, detect, and to report bribery. In the event that bribery is detected, it must be reported to a Director without delay.

If you are offered any financial or non-financial inducements decisions will be made in your favour providing they have been declined and it has been reported.

## **What to do if you have any concerns**

If you have any concerns that anyone may be in breach of this policy, this must be reported to a Director and it will be investigated in confidence as per our whistleblowing policy HR00349

## **Compliance**

The Company reserves the right to terminate its contractual arrangements with any associated person, at any time, if they are found to be in breach of the Bribery Act 2010.